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10 Attorney for Defendants
11 Ripple Labs Inc., XRP II, LLC, Bradley
12 Garlinghouse, Christian Larsen, Ron Will,
13 Antoinette O’Gorman, Eric van Miltenburg,
Susan Athey, Zoe Cruz, Ken Kurson, Ben
Lawsky, Anja Manuel, and Takashi Okita

14 (Additional Counsel on Signature Page)

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

17 IN RE RIPPLE LABS INC. LITIGATION) CASE NO.: 4:18-cv-06753
18)
19 VLADI ZAKINOV, DAVID OCONER, &) CLASS ACTION
AVNER GREENWALD, individually and on)
behalf of all others similarly situated,)
20) **STIPULATION REGARDING**
Plaintiff,) **DEFENDANTS' TIME TO ANSWER OR**
21) **OTHERWISE RESPOND PURSUANT**
v.) **TO CIVIL L.R. 6-1(a)**
22)
23 RIPPLE LABS INC., et al.,)
Defendants.)
24)

1 WHEREAS, on November 7, 2018, Defendants Ripple Labs Inc., XRP II, LLC, Bradley
2 Garlinghouse, Christian Larsen, Ron Will, Antoinette O’Gorman, Eric van Miltenburg, Susan
3 Athey, Zoe Cruz, Ken Kurson, Ben Lawsky, Anja Manuel, and Takashi Okita (collectively,
4 “Defendants”), removed this matter from the Superior Court of the State of California, County of
5 San Mateo (“San Mateo Superior Court”), to the United States District Court for the Northern
6 District of California;

7 WHEREAS, pursuant to Federal Rule of Civil Procedure 81(c)(2)(C), Defendants’ deadline
8 to answer, move, or otherwise respond to the Complaint is November 14, 2018;

9 WHEREAS, Plaintiffs have indicated their intent to file a motion to remand this matter
10 back to the San Mateo Superior Court within 30 days provided by 28 U.S.C. § 1447(c);

11 WHEREAS, the parties have agreed to defer the time for Defendants to answer, move, or
12 otherwise respond to the Complaint until a time after the Court decides the forthcoming motion to
13 remand in order to avoid unnecessary motion practice before the Court has decided subject matter
14 jurisdiction;

15 WHEREAS, the stipulated change to Defendants’ time to answer, move, or otherwise
16 respond to Plaintiffs’ Complaint will not alter the date of any event or any deadline already fixed
17 by Court order.

18 THEREFORE, PURSUANT TO CIVIL LOCAL RULE 6-1(A), IT IS HEREBY
19 STIPULATED AND AGREED, by and between the attorneys for the undersigned parties, as
20 follows:

21 1. If the Court grants Plaintiffs’ forthcoming motion to remand, and this action is
22 remanded to the San Mateo Superior Court, Defendants’ deadline to answer, move, or otherwise
23 respond shall be in fourteen (14) days “from the day the original court receives the case on
24 remand.” Cal. Civ. Proc. Code § 430.90(a)(2).

25 2. If the Court denies Plaintiffs’ forthcoming motion to remand, Defendants’ deadline
26 to answer, move, or other otherwise respond to the Complaint shall be fourteen (14) days from the
27 date the Court enters an order denying the motion to remand.

28

1 3. Nothing herein shall be deemed to constitute a waiver of any rights, claims,
2 defenses, motions, or objections that a party may have or make with respect to jurisdiction, venue
3 and/or the claims set forth in this action.

IT IS SO STIPULATED.

5 | DATED: November 8, 2018

SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP

By: _____ /s/*Peter B. Morrison*
Peter B. Morrison
Attorneys For Defendants

10 | DATED: November 8, 2018

ROBBINS ARROYO LLP

By: */s/Stephen J. Oddo*
Stephen J. Oddo
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E-FILING ATTESTATION

I, Peter Morrison, am the ECF user whose ID and password are being used to file this document. In compliance with Civil Local Rule 5-1(i)(3), I hereby attest that each of the signatories identified above has concurred in this filing.

DATED: November 8, 2018

SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP

By: /s/Peter B. Morrison
PETER B. MORRISON